



PELTON GRAHAM LLC

ADVOCATES FOR JUSTICE

September 28, 2023

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VIA ECF

The Honorable John P. Cronan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

The request is granted. Plaintiff shall file the motion to dismiss by November 1, 2023, opposition is due by November 22, 2023, and any reply is due by December 4, 2023. The Clerk of Court is respectfully directed to close Docket Number 19.

SO ORDERED.
Date: October 2, 2023
New York, New York

JOHN P. CRONAN
United States District Judge

Re: *Popa v. Cohen Brothers Realty Corporation, et ano.*
Civil Action No. 1:23-cv-04771 (JPC)(SN)

Dear Judge Cronan:

This firm represents plaintiff Stelian Marin Popa (“Plaintiff”) in the above-referenced action. We write, jointly with counsel for Defendants, to respectfully request an extension of the deadlines set forth in the Court’s September 20, 2023 Order regarding Plaintiff’s anticipated motion to dismiss the counterclaims asserted by Defendants. (Dkt. No. 18 [the “Sept. 20 Order”]).

Pursuant to the Court’s Mediation Referral Order (Dkt. No. 11), the parties participated in a first mediation session on September 12, 2023, before Dennis J. Drebsky, Esq. Although a resolution to Plaintiff’s claims was not reached at the first session, the parties agreed to keep the mediation open and continue their negotiations pending Defendants’ exchange of additional personnel records for Plaintiff, which the parties believe are necessary to further their negotiations. In order to allow the parties to dedicate their resources towards their ongoing settlement negotiations, the parties propose an approximately 30-day extension to the current briefing schedule set forth in the Sept. 20 Order, as follows: Plaintiff to file the motion to dismiss by November 1, 2023, Defendants’ opposition due by November 22, 2023, and any reply due by December 4, 2023.

This is the first request to extend the current briefing schedule, and it is made on consent of all parties.

We appreciate Your Honor’s attention to this matter.

Respectfully submitted,

/s/ Brent E. Pelton

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Joint Letter to Extend Motion to Dismiss Briefing Schedule
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cc: All counsel (via ECF)